

**REMARKS**

This amendment is in response to the Office Action of May 26, 2004.

Claims 1 through 15 are currently pending in the application.

Claims 2, 3, and 10 are allowed.

Claims 1, 4 through 9, and 11 through 15 stand rejected.

Applicants propose to amend claims 1 and 15, and respectfully request reconsideration of the application as proposed.

**35 U.S.C. § 103(a) Obviousness Rejections**

**Obviousness Rejection Based on Yew et al. (U.S. Patent 6,049,129) in view of APA (17)**

Claims 1, 4, 5, 7, 9 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Yew et al. (U.S. Patent 6,049,129) in view of APA (17). Applicant respectfully proposes to traverse this rejection as hereinafter set forth.

Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

Applicant asserts that any combination of the Yew et al. reference and APA (17) does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1 and 15 because, at the very least, any combination of the cited prior art fails to teach or suggest all the claim limitations of the presently claimed inventions. In addition, any rejection of the inventions of presently amended independent claims 1 and 15 would be a hindsight reconstruction of the presently claimed inventions based solely upon Applicant's disclosure and not the cited prior art, as any combination of the cited prior art fails to teach or suggest all the claim limitations of the presently claimed inventions.

The disclosure of Yew et al. teaches or suggests a substantially flat high frequency integrated circuit package having substantially the same outline as the silicon chip. (Col. 1, lines 7-9, Col. 3, lines 16-17). The integrated circuit package 30 comprises a silicon chip 50. Printed circuit board 70 is attached to silicon chip 50 by an adhesive layer 60. Printed circuit board 70 consists of three layers, a top layer 72, an intermediate layer 74, and a bottom layer 76. (Col. 3, lines 48-57). Intermediate layer 74 has routing strips 82 that are electrically connected through vias 84 to pads 100 located on top surface 92 of top layer 72. (Col. 4, line 66 - Col. 5, line 2). Intermediate layer 74 includes a pair of bus bars 110. These bus bars are electrically connected through vias 84 to one or more pads 110. (Col. 5, lines 7-9). Silicon chip 50 is connected to routing strips 82 and bus bars 110 through bonding pads 120. (Col. 5, lines 14-17). Connections to the routing strips 82 and bus bars 110 are made through opening 86. (FIG. 2). Bus bars 110 are connected to pads 100 by wire bonding through opening 86. (FIGs. 4 and 5, Col. 8, lines 55-58, lines 60-62).

APA (17) teaches or suggests, when taken with drawing FIGS. 16 and 18, that a technique of face-down attachment of a semiconductor die 232 onto a semiconductor substrate 234 with an adhesive tape 236 has been developed. With this technique, the semiconductor substrate 234 has an opening 238 therethrough with electrical connections 240 (shown as bond wires) extending through the opening 238 to connect the bond pads 242 on an active surface 262 of the semiconductor die 232 to the traces 244 on an active surface 250 of the semiconductor substrate 234. The adhesive tape 236 used in these assemblies is generally narrow and does not extend to an edge 246 of the semiconductor die 232, resulting in exterior voids 248, and does not extend to an edge 252 of the opening 238, resulting in interior voids 254. The opening 238 is filled and the electrical connections 240 are covered with a glob top material 256 injected into the opening 238, as shown in FIG. 17. Thus, the electrical connections 240 are protected from bond wire sweep and connection detachment. As shown in FIG. 18, an encapsulant material 258 is molded over the semiconductor die 232.

Applicant asserts that any combination of the Yew et al. reference and APA (17) fails to teach or suggest the claim limitations of *"at least one adhesive tape interposed between and attaching said semiconductor die active surface and said semiconductor substrate first surface, a width of said at least one adhesive tape extending at least proximate an edge of said at least one*

*semiconductor die to an edge of said at least one semiconductor substrate opening, a length of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an opposite edge of said at least one semiconductor die, wherein a contact area between said at least one semiconductor die and said semiconductor substrate is substantially maximized,”* as recited in independent claims 1 and 15 as currently amended. Any combination of the Yew et al. reference and APA (17) contains no teaching or suggestion whatsoever regarding such claim limitations. The Yew et al. reference is silent regarding any such claim limitations while APA (17) clearly sets forth the prior art having such a problem as Applicant’s invention addresses. Therefore, any combination of the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1 and 15.

In the Office Action, it is asserted that the functional limitation of “at least one adhesive tape ... *for substantially preventing damage to a portion of the active surface of the semiconductor die by filler particles in a material used to fill the at least one opening in the substrate being located between the first surface of the substrate and the active surface of the at least one semiconductor die*” (emphasis added) is inherent in Yew’s device because “the adhesive tape of Yew also is extending an edge of the semiconductor die to edge of the semiconductor substrate opening.” However, Applicant respectfully disagrees, and asserts that Yew et al. do not disclose such an adhesive tape. This is clearly evident upon considering the limitation recited in structural form (as currently amended) as opposed to the previously presented functional form. The disclosure of Yew et al. does not teach or suggest an adhesive tape that includes “a width ... extending at least proximate an edge of [a] semiconductor die to an edge of [a] semiconductor substrate opening, a length of ... extending at least proximate an edge of [the] semiconductor die to an opposite edge of [the] semiconductor die, wherein a contact area between [the] semiconductor die and [the] semiconductor substrate is substantially maximized,” as described in the as-filed specification and shown in the as-filed figures, and as is required to perform the function recited in the previously presented claim. The size and shape of the adhesive layer is not sufficiently described in the disclosure of Yew et al. to reasonably conclude that such features are inherent in the device disclosed therein.

Further, Applicant asserts that any rejection of the inventions of presently amended independent claims 1 and 15 would be a hindsight reconstruction of the presently claimed inventions based solely upon Applicant's disclosure, not the cited prior art, as any combination of the cited prior art fails to teach or suggest all the claim limitations of the presently claimed inventions. Such a rejection is neither contemplated by nor within the ambit of 35 U.S.C. § 103 and is clearly improper. Further, any such rejection cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of independent claims 1 and 15 as currently amended.

Therefore, Applicant asserts that presently amended independent claims 1 and 15 are allowable over the cited prior art. In addition, Applicant asserts that claims 4 through 9 and 11 through 14 are allowable at least because each depends either directly or indirectly from claim 1, which is allowable.

Obviousness Rejection Based on Yew et al. (U.S. Patent 6,049,129) in view of APA (Fig. 15 & 17) and Khandros et al. (U.S. Patent 5,148,266)

Claim 6 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Yew et al. (U.S. Patent No. 6,049,129) in view of APA (15 & 17) and Khandros et al. (U.S. Patent 5,148,266). Applicant respectfully proposes to traverse this rejection, as hereinafter set forth.

Again, Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

Again, turning to the cited prior art, the disclosure of Yew et al. teaches or suggests a substantially flat high frequency integrated circuit package having substantially the same outline as the silicon chip. (Col. 1, lines 7-9, Col. 3, lines 16-17). The integrated circuit package 30 comprises a silicon chip 50. Printed circuit board 70 is attached to silicon chip 50 by an adhesive

layer 60. Printed circuit board 70 consists of three layers, a top layer 72, an intermediate layer 74, and a bottom layer 76. (Col. 3, lines 48-57). Intermediate layer 74 has routing strips 82 that are electrically connected through vias 84 to pads 100 located on top surface 92 of top layer 72. (Col. 4, line 66 - Col. 5, line 2). Intermediate layer 74 includes a pair of bus bars 110. These bus bars are electrically connected through vias 84 to one or more pads 110. (Col. 5, lines 7-9). Silicon chip 50 is connected to routing strips 82 and bus bars 110 through bonding pads 120. (Col. 5, lines 14-17). Connections to the routing strips 82 and bus bars 110 are made through opening 86. (FIG. 2). Bus bars 110 are connected to pads 100 by wire bonding through opening 86. (FIGs. 4 and 5, Col. 8, lines 55-58, lines 60-62).

APA (17) teaches or suggests, when taken with drawing FIGS. 16 and 18, that a technique of face-down attachment of a semiconductor die 232 onto a semiconductor substrate 234 with an adhesive tape 236 has been developed. With this technique, the semiconductor substrate 234 has an opening 238 therethrough with electrical connections 240 (shown as bond wires) extending through the opening 238 to connect the bond pads 242 on an active surface 262 of the semiconductor die 232 to the traces 244 on an active surface 250 of the semiconductor substrate 234. The adhesive tape 236 used in these assemblies is generally narrow and does not extend to an edge 246 of the semiconductor die 232, resulting in exterior voids 248, and does not extend to an edge 252 of the opening 238, resulting in interior voids 254. The opening 238 is filled and the electrical connections 240 are covered with a glob top material 256 injected into the opening 238, as shown in FIG. 17. Thus, the electrical connections 240 are protected from bond wire sweep and connection detachment. As shown in FIG. 18, an encapsulant material 258 is molded over the semiconductor die 232.

The Khandros reference teaches or suggests a semiconductor chip assembly having an interposer and flexible leads (Title). The semiconductor chip is mounted to contact pads in a compact area array. An interposer is disposed between the chip and the substrate. The contacts on the chip are connected to terminals on the interposer by flexible leads that extend through openings in the interposer. (Abstract).

Again, Applicant asserts that any combination of the Yew et al. reference, APA (17), and the Khandros et al. reference fails to teach or suggest the claim limitations of "*at least one adhesive tape interposed between and attaching said semiconductor die active surface and said*

*semiconductor substrate first surface, a width of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an edge of said at least one semiconductor substrate opening, a length of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an opposite edge of said at least one semiconductor die, wherein a contact area between said at least one semiconductor die and said semiconductor substrate is substantially maximized,"* as recited in independent claim 1 as currently amended, from which claim 6 depends through intervening claim 4. Any combination of the Yew et al. reference, APA (17), and the Khandros et al. reference contains no teaching or suggestion whatsoever regarding such claim limitations. Both the Yew et al. reference and the Khandros et al. reference are silent regarding any such claim limitations while APA (17) clearly sets forth the prior art having such a problem as Applicant's invention addresses. Therefore, any combination of the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the inventions of independent claim 1 as currently amended and dependent claim 6, which depends from claim 1.

Further, Applicant asserts that any rejection of the inventions of currently amended independent claim 1 and dependent claim 6 would be a hindsight reconstruction of the presently claimed inventions based solely upon Applicant's disclosure and not the cited prior art, as any combination of the cited prior art fails to teach or suggest all the claim limitations of the presently claimed inventions. Such a rejection is neither contemplated by nor within the ambit of 35 U.S.C. § 103 and is clearly improper. Further, any such rejection cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the inventions of currently amended independent claim 1 and dependent claim 6, which depends from claim 1.

Therefore, Applicant asserts that currently amended independent claim 1 and dependent claim 6 are allowable over any combination of the cited prior art.

Obviousness Rejection Based on Yew et al. (U.S. Patent 6,049,129) in view of APA (Fig. 17) and further in view of Murakami et al. (U.S. Patent 5,612,569)

Claim 8 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Yew et al. (U.S. Patent 6,049,129) in view of APA (17) and further in view of Murakami et al. (U.S. Patent 5,612,569). Applicant respectfully proposes to traverse this rejection, as hereinafter set forth.

Again, Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

Again, turning to the cited prior art, Yew et al. teaches or suggests a substantially flat high frequency integrated circuit package having substantially the same outline as the silicon chip. (Col. 1, lines 7-9, Col. 3, lines 16-17). The integrated circuit package 30 comprises a silicon chip 50. Printed circuit board 70 is attached to silicon chip 50 by an adhesive layer 60. Printed circuit board 70 consists of three layers, a top layer 72, an intermediate layer 74, and a bottom layer 76. (Col. 3, lines 48-57). Intermediate layer 74 has routing strips 82 that are electrically connected through vias 84 to pads 100 located on top surface 92 of top layer 72. (Col. 4, line 66 - Col. 5, line 2). Intermediate layer 74 includes a pair of bus bars 110. These bus bars are electrically connected through vias 84 to one or more pads 110. (Col. 5, lines 7-9). Silicon chip 50 is connected to routing strips 82 and bus bars 110 through bonding pads 120. (Col. 5, lines 14-17). Connections to the routing strips 82 and bus bars 110 are made through opening 86. (FIG. 2). Bus bars 110 are connected to pads 100 by wire bonding through opening 86. (FIGs. 4 and 5, Col. 8, lines 55-58, lines 60-62).

APA (17) teaches or suggests, when taken with drawing FIGS. 16 and 18, a technique of face-down attachment of a semiconductor die 232 onto a semiconductor substrate 234 with an adhesive tape 236 has been developed. With this technique, the semiconductor substrate 234 has an opening 238 therethrough with electrical connections 240 (shown as bond wires) extending through the opening 238 to connect the bond pads 242 on an active surface 262 of the semiconductor die 232 to the traces 244 on an active surface 250 of the semiconductor substrate 234. The adhesive tape 236 used in these assemblies is generally narrow and does not extend to an edge 246 of the semiconductor die 232, resulting in exterior voids 248, and does not extend to an edge 252 of the opening 238, resulting in interior voids 254. The opening 238 is filled and

the electrical connections 240 are covered with a glob top material 256 injected into the opening 238, as shown in FIG. 17. Thus, the electrical connections 240 are protected from bond wire sweep and connection detachment. As shown in FIG. 18, an encapsulant material 258 is molded over the semiconductor die 232.

Murakami teaches or suggests a semiconductor device having bonding wires 5 covered with a flexible/fluid substance 20. Mold resin 2A covers flexible/fluid substance 20. The mold resin 2A is bored with a hole 22 at the side opposite to the principal surface of the semiconductor chip 1 to expose a portion of the semiconductor chip 1 to the outside. (FIG. 34, Col. 31, lines 13-17).

Again, Applicant asserts that any combination of the Yew et al. reference, the Murakami reference, and APA (17) fails to teach or suggest the claim limitations of *"at least one adhesive tape interposed between and attaching said semiconductor die active surface and said semiconductor substrate first surface, a width of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an edge of said at least one semiconductor substrate opening, a length of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an opposite edge of said at least one semiconductor die, wherein a contact area between said at least one semiconductor die and said semiconductor substrate is substantially maximized,"* as recited in independent claim 1 as currently amended, from which claim 8 depends through intervening claims 4 and 7. Any combination of the Yew et al. reference, the APA (17), and the Murakami reference contains no teaching or suggestion whatsoever regarding such claim limitations. Both the Yew et al. reference and the Murakami reference are silent regarding any such claim limitations while APA (17) clearly sets forth the prior art having such a problem as Applicant's invention addresses. Therefore, any combination of the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claim 1 as well as claim 8, which depends from claim 1.

Further, Applicant asserts that any rejection of the inventions of currently amended independent claim 1 and dependent claim 8 would be a hindsight reconstruction of the presently claimed inventions based solely upon Applicant's disclosure and not the cited prior art, as any combination of the cited prior art fails to teach or suggest all the claim limitations of the



presently claimed inventions. Such a rejection is neither contemplated by nor within the ambit of 35 U.S.C. § 103 and is clearly improper. Further, any such rejection cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the inventions of currently amended independent claim 1 and dependent claim 8, which depends from claim 1.

Therefore, Applicant asserts that independent claim 1 as currently amended and dependent claim 8 are allowable over any combination of the cited prior art.

Obviousness Rejection Based on Yew et al. (U.S. Patent 6,049,129) in view of APA (Fig. 17) and further in view of Boyko et al. (U.S. Patent 5,784,782)

Claims 11 through 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Yew et al. (U.S. Patent 6,049,129) in view of APA (17) and further in view of Boyko et al. (U.S. Patent 5,784,782). Applicant respectfully proposes to traverse this rejection, as hereinafter set forth.

Yet again, Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

Turning to the cited prior art, the disclosure of Yew et al. teaches or suggests a substantially flat high frequency integrated circuit package having substantially the same outline as the silicon chip. (Col. 1, lines 7-9, Col. 3, lines 16-17). The integrated circuit package 30 comprises a silicon chip 50. Printed circuit board 70 is attached to silicon chip 50 by an adhesive layer 60. Printed circuit board 70 consists of three layers, a top layer 72, an intermediate layer 74, and a bottom layer 76. (Col. 3, lines 48-57). Intermediate layer 74 has routing strips 82 that are electrically connected through vias 84 to pads 100 located on top surface 92 of top layer 72. (Col. 4, line 66 - Col. 5, line 2). Intermediate layer 74 includes a pair of bus bars 110. These bus bars are electrically connected through vias 84 to one or more pads 110. (Col. 5, lines 7-9). Silicon

chip 50 is connected to routing strips 82 and bus bars 110 through bonding pads 120. (Col. 5, lines 14-17). Connections to the routing strips 82 and bus bars 110 are made through opening 86. (FIG. 2). Bus bars 110 are connected to pads 100 by wire bonding through opening 86. (FIGs. 4 and 5, Col. 8, lines 55-58, lines 60-62).

APA (17) teaches or suggests, when taken with drawing FIGS. 16 and 18, that a technique of face-down attachment of a semiconductor die 232 onto a semiconductor substrate 234 with an adhesive tape 236 has been developed. With this technique, the semiconductor substrate 234 has an opening 238 therethrough with electrical connections 240 (shown as bond wires) extending through the opening 238 to connect the bond pads 242 on an active surface 262 of the semiconductor die 232 to the traces 244 on an active surface 250 of the semiconductor substrate 234. The adhesive tape 236 used in these assemblies is generally narrow and does not extend to an edge 246 of the semiconductor die 232, resulting in exterior voids 248, and does not extend to an edge 252 of the opening 238, resulting in interior voids 254. The opening 238 is filled and the electrical connections 240 are covered with a glob top material 256 injected into the opening 238, as shown in FIG. 17. Thus, the electrical connections 240 are protected from bond wire sweep and connection detachment. As shown in FIG. 18, an encapsulant material 258 is molded over the semiconductor die 232.

Boyko teaches or suggests a method for fabricating printed circuit boards with cavities. The printed circuit board 10 has a dielectric layer 12 with metalizations 14 and 16 on both surfaces. (FIG. 1). The printed circuit board may have an additional dielectric layer 22, also with metalizations 24 and 26 on both surfaces. (FIG. 1). A window 30 is cut in dielectric layer 22 to form a cavity 31. (FIG. 1). Sticker/adhesive sheet 40, which may be epoxy-glass or "pre-preg" is located between metallized dielectric sheets 12 and 22. (Col. 3, lines 35-38). Sticker/adhesive sheet 40 is designed for high flow when heat and pressure are applied. A window 44 is cut in sticker/adhesive sheet 40 and this window registers with window 30 in dielectric layer 22. (Col. 3, lines 38-44). A release layer 50 is placed on top of metallized dielectric layer 22. Layer 50 is highly stretchable and conformable. (Col. 3, lines 45-48). A sheet 60 of plug material 61 is laid on top of release layer 50. At room temperature, the plug material is pliable enough to tightly conform to cavity 31 and seal in sticker/adhesive sheet 40. (Col. 3, lines 60-62). Another non-melting release layer 70 is laid over sheet 60. Next, a breather layer 74 is laid over release layer

70. The resulting structure is sealed in a nylon bag, the bag is evacuated, and subjected to heat and pressure. (Col. 4, lines 21-29). When the release layer 70, sheet 74, are removed the resulting structure has the sticker/adhesive sheet bound ground plane 16 to metallized dielectric layer 22. The sticker/adhesive material has flowed within the cavity 31, creating a fillet 82 of the sticker/adhesive sheet material along the bottom perimeter of the cavity. (Col. 4, lines 32-39).

Applicant respectfully submits that any combination of the Yew et al. reference, the Boyko et al. reference, and APA (17) fails to teach or suggest the claim limitations of "at least one fillet located proximate said at least one adhesive tape and said edge of said at least one semiconductor die" as recited in claim 11; "at least one fillet located proximate said at least one adhesive tape and said edge of said at least one semiconductor substrate opening" as recited in claim 12; "at least one fillet located proximate said at least one adhesive tape and said active surface of said at least one semiconductor die" as recited in claim 13; and "at least one fillet located proximate said at least one adhesive tape and said semiconductor substrate first surface" as recited in claim 14. Yew and APA (17) do not teach fillets. Boyko teaches fillets within a cavity formed in layers of a printed circuit board. The fillet material of Boyko is heated to liquify and settle at the bottom of the cavity to form fillets. Boyko does not teach or suggest that the fillet is proximate to adhesive tape, edge of semiconductor die, or substrate opening. Any semiconductor device mounted to the printed circuit board of Boyko would not be proximate to the fillets formed during the printed circuit board fabrication process since the fillets are formed at the bottom of the cavity, away from the mounting surface.

In addition, the references themselves teach away from the proposed combination and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed invention since Boyko is directed toward producing a printed circuit board with cavity. Yew teaches a chip size integrated package. It would not be obvious to combine a method for producing printed circuit board with cavities and a method for producing chip scale packages. Printed circuit board fabrication requires higher temperatures and pressures that would damage or destroy semiconductors.

Accordingly, any combination of Yew and Boyko and APA (17) cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed invention.

Again, Applicant asserts that any combination of the Yew et al. reference and the Boyko reference and APA (17) additionally fails to teach or suggest the claim limitations of “*at least one adhesive tape interposed between and attaching said semiconductor die active surface and said semiconductor substrate first surface, a width of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an edge of said at least one semiconductor substrate opening, a length of said at least one adhesive tape extending at least proximate an edge of said at least one semiconductor die to an opposite edge of said at least one semiconductor die, wherein a contact area between said at least one semiconductor die and said semiconductor substrate is substantially maximized,*” as recited in independent claim 1 as currently amended, from which claims 11 through 14 depend. Any combination of the Yew et al. reference, the Boyko reference, and APA (17) contains no teaching or suggestion whatsoever regarding such claim limitations. Both the Yew et al. reference and the Boyko reference are silent regarding any such claim limitations while APA (17) clearly sets forth the prior art having such a problem as Applicant’s invention addresses. Therefore, any combination of the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of independent claim 1 as currently amended and dependent claims 11 through 14, which depend from claim 1.

Further, Applicant asserts that any rejection of the inventions of independent claim 1 as currently amended and dependent claims 11 through 14 would be a hindsight reconstruction of the inventions as presently claimed based solely upon Applicant’s disclosure and not the cited prior art, as any combination of the cited prior art fails to teach or suggest all the claim limitations of the inventions as presently claimed. Such a rejection is neither contemplated by nor within the ambit of 35 U.S.C. § 103 and is clearly improper. Further, any such rejection cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the inventions of independent claim 1 as currently amended and dependent claims 11 through 14, which depend from claim 1.

Therefore, Applicant asserts that independent claim 1 as currently amended and dependent claims 11 through 14 are allowable over any combination of the cited prior art.

#### **Allowable Subject Matter**

Applicant notes with appreciation the allowance of claims 2, 3 and 10.

#### **Entry of Amendments**

Applicant asserts that the proposed amendments to claims 1 and 15 should be entered because the amendment is timely filed, the amendment places the application in condition for allowance, the amendment does not require any further search or consideration, the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application to comply with 35 U.S.C. § 132. The amendments are supported by the as-filed specification at page 13, line 25 through page 14, line 4; at page 14 lines 13 through 17; and by FIG. 9 and its description at page 15 lines 1 through 9. In particular, as seen in FIG. 9, the adhesive tape is illustrated as extending from proximate the edge of the semiconductor die at the bottom of the figure along the length of the die to the opposite edge of the die at the top of the diagram. In addition, the as-filed specification recites at page 13, lines 25 through 29, that the adhesive tape configuration of the claimed invention “maximizes the contact area between the semiconductor die 102 and the semiconductor substrate 104.” The proposed amendments do not add any new matter to the application, but merely recite the limitations previously presented in structural form rather than in functional form, and therefore no new or further search or consideration is required.

**CONCLUSION**

Applicant submits that claims 1 through 15 as currently amended are clearly allowable over the cited prior art, and requests the allowance of claims 1, 4 through 9, and 11 through 15 and that the case be passed for issue.

Respectfully submitted,



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